

1 DAYLE ELIESON  
Acting United States Attorney  
2 District of Nevada  
Nevada Bar No. 2137  
3 MARCELO ILLARMO, MABN 670079  
Special Assistant United States Attorney  
4 160 Spear Street, Suite 800  
San Francisco, California 94105  
5 Telephone: (415) 977-8944  
6 Facsimile: (415) 744-0134  
E-Mail: Marcelo.Illarmo@ssa.gov  
7 Attorneys for Defendant

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 NAIM R. CONSTANDI )

11 Plaintiff, )

12 v. )

13 NANCY A. BERRYHILL,  
Acting Commissioner of Social Security, )

14 Defendant. )  
15 )

Case No.: 2:17-cv-02019-JCM-PAL

UNOPPOSED MOTION FOR EXTENSION  
OF TIME (FIRST REQUEST)

16  
17 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant")  
18 respectfully requests that the Court extend the time for Defendant to file her response to Plaintiff's  
19 Complaint, due on March 6, 2018 by 30 days, through and including April 6, 2018.

20 Defendant respectfully requests this additional time because additional time is needed to file  
21 the certified administrative record. This request is made in good faith with no intention to unduly  
22 delay the proceedings.

23 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
24 motion, on March 6, 2018.  
25  
26

1 Dated: March 6, 2018.

2 Respectfully submitted

3 DAYLE ELIESON  
4 Acting United States Attorney

5 /s/ Marcelo Illarmo  
6 MARCELO ILLARMO  
7 Special Assistant United States Attorney

8 IT IS SO ORDERED:

9   
10 UNITED STATES MAGISTRATE JUDGE

11 DATED: March 7, 2018  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

1 **CERTIFICATE OF SERVICE**

2 I, Marcelo Illarmo, certify that the following individual(s) were served with a copy of the  
3 foregoing document on the date, and via the method of service, identified below:

4 **CM/ECF:**

5 Cyrus Safa  
6 E-mail: cyrus.safa@rohlflinglaw.com

7 Leonard Stone  
8 Email: lstone@shookandstone.com

9 Dated *March 6, 2018*.

10 /s/ Marcelo Illarmo  
11 **MARCELO ILLARMO**  
12 Special Assistant United States Attorney  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26